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7 Attorneys for Plaintiff and Cross-Defendant
8 CHURCH OF SCIENTOLOGY OF CALIFORNIA

9 SUPERIOR COURT OF THE STATE OF CALIFORNIA
10 FOR THE COUNTY OF LOS ANGELES

11	CHURCH OF SCIENTOLOGY OF CALIFORNIA, a California Corporation,)	Case No. C 420 153
12)	
13	Plaintiff,)	CROSS-DEFENDANT CHURCH OF SCIENTOLOGY OF CALIFORNIA'S RESPONSE TO CROSS-COMPLAINANT GERALD ARMSTRONG'S REQUEST FOR PRODUCTION OF DOCUMENTS
14	v.)	
15	GERALD ARMSTRONG, et al.,)	
16	Defendants.)	
17	<hr/>		
18	AND RELATED CROSS-ACTION.)	
19	<hr/>		

20 Cross-Defendant Church of Scientology of California
21 responds to Cross-Complainant's Request for Production of
22 Documents as follows:

23 1. Without waiving any objections, Cross-Defendant
24 responds that, to the extent said documents pertaining to
25 Cross-Complainant exist, they have already been produced.

26 2. Cross-Defendant will produce the documents in its
27 possession, custody or control.

28 3. Cross-Defendant has no such documents in its
possession, custody or control.

EXHIBIT W PAGE 38

4. Without waiving any objections, Cross-Defendant

1 responds that it has no such documents in its possession,
2 custody or control.

3 5. Without waiving any objections, Cross-Defendant
4 responds that to the extent that any documents exist within
5 this category, said documents have already been produced.

6 6. Cross-Defendant has no such documents in its
7 possession, custody or control.

8 7. Without waiving any objections, Cross-Defendant
9 responds that to the extent that any documents exist within
10 this category, said documents have already been produced.

11 8. Cross-Defendant has no documents which show any
12 alleged assault of Cross-Complainant, running into him, or any
13 attempts to involve Cross-Complainant and Joyce Armstrong in
14 freeway accidents or any type of harassment. Correspondence
15 and reports to and from private investigators are privileged
16 as attorney work product.

17 9. Cross-Defendant has no such documents in its
18 possession, custody or control.

19 10. Cross-Defendant has no such documents in its
20 possession, custody or control.

21 11. Cross-Defendant denies that Cross-Complainant was
22 harassed in London in June 1984. Cross-Defendant is aware that
23 Cross-Complainant was legitimately served with a valid order
24 by the California Court of Appeal, and will produce documents
25 in our possession, custody or control.

26 12. Cross-Defendant has no such documents in its
27 possession, custody or control.

28 13. Without waiving any objections, no such orders,

1 reports or correspondence exist regarding Cross-Complainant.
2 As to documents, any that fall within this Request for
3 Production which pertain to Cross-Complainant either have
4 already been produced or are equally available to
5 Cross-Complainant.

6 14. Cross-Defendant is searching its files and will
7 produce any of the requested documents in its possession,
8 custody or control.

9 15. Cross-Defendant has no knowledge of any burglary of
10 Cross-Complainant's trunk. Hence, Cross-Defendant has no such
11 documents in its possession, custody or control.

12 16. Cross-Defendant has no such documents in its
13 possession, custody or control.

14 17. Cross-Defendant has no such documents in its
15 possession, custody or control.

16 18. Without waiving any objections, Cross-Defendant
17 denies that it has ever obtained any "false authorizations"
18 with respect to any alleged wiretapping of either Cross-
19 Complainant or Michael Flynn. No documents exist.

20 19. Cross-Defendant has no such documents in its
21 possession, custody or control.

22 20. Cross-Defendant has no such documents in its
23 possession, custody or control.

24 21. "Armstrong Operation" is a characterization invented
25 by Cross-Complainant as no such "operation" has ever existed.
26 Cross-Defendant has no such documents in its possession,
27 custody or control.

28 22. Cross-Defendant has no such documents in its

1 possession, custody or control. There is no such thing as an
2 operation to frame Flynn and Armstrong regarding the
3 \$2,000,000 check. Object to production of documents regarding
4 check as not leading to discovery of admissible evidence
5 relevant to this case.

6 23. Cross-Defendant objects on the grounds that this
7 Request is vague, ambiguous, overbroad, burdensome and
8 harassing. The documents requested herein are irrelevant to
9 any cause of action in the cross-complaint and are not
10 calculated to lead to the discovery of any evidence admissible
11 in this action.

12 24. Cross-Defendant incorporates by reference as if fully
13 set forth herein its response to Request for Production No. 23.

14 25. This Request for Production seeks documents which,
15 in part, are irrelevant to any cause of action in the
16 cross-complaint and are not calculated to lead to the discovery
17 of any evidence admissible in this action. Any documents
18 which are calculated to lead to the discovery of admissible
19 evidence and which do exist have already been produced to
20 Cross-Complainant.

21 26. See response to Request #25.

22 27. Any such documents which exist have already been
23 produced to Cross-Complainant.

24 28. Any such documents which exist have already been
25 produced to Cross-Complainant.

26 29. Cross-Defendant has no such correspondence, orders,
27 reports, statements, payments, reports or cancelled checks in
28 its possession, custody or control. Cross-Defendant possesses

1 a declaration of L. Fletcher Prouty which will be produced.

2 30. Cross-Defendant will produce the requested videotape
3 in its possession, custody or control.

4 31. Cross-Defendant is informed and believes that
5 Cross-Complainant already has complete copies of the
6 videotapes requested herein. No other documents exist.
7 Nothing, either audio or visual, was edited from said
8 videotapes. There are no correspondence, orders, reports,
9 statements, documents or materials relating to an editing
10 prior to Christofferson.

11 32. Cross-Defendant has no such documents in its
12 possession, custody or control.

13 33. Cross-Defendant cannot locate any specific items
14 that have been sent to the media, however, a continued search
15 is being made to ascertain if items sent to media on other
16 subjects contained information regarding Cross-Complainant.
17 Cross-Defendant will supplement this response if any are
18 located.

19 34. Cross-Defendant has no such documents in its
20 possession, custody or control.

21 35. Cross-Defendant has no such documents in its
22 possession, custody or control.

23 36. Cross-Defendant has no such documents in its
24 possession, custody or control.

25 37. Cross-Defendant will produce all documents and
26 materials in our possession except memo to files dated
27 10-21-85, 11-19-85 and 11-20-85, from attorney Roger Geller
28 which is privileged as attorney work product.

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Cross-Defendant has no such documents in its possession,
custody or control.

39. This Request for Production seeks documents which
are irrelevant to any cause of action in the cross-complaint
and is not calculated to lead to the discovery of any evidence
admissible in this action.

40. Cross-Defendant has no such documents in its
possession, custody or control.

41. Without waiving any objections, Cross-Defendant
denies that any "operation or mission" to "Black PR"
Cross-Complainant" ever existed. Cross-Defendant has no such
documents in its possession, custody or control.

42. Cross-Defendant has no such documents in its
possession, custody or control.

43. Cross-Defendant has no such documents in its
possession, custody or control.

DATED: September 2, 1986

PETERSON & BRYNAN

BY: John G. Peterson
JOHN G. PETERSON

VERIFICATION

STATE OF CALIFORNIA, COUNTY OF CROSS-DEFENDANT CHURCH OF SCIENTOLOGY OF CALIFORNIA'S RESPONSE TO CROSS-COMPLAINANT GERALD ARMSTRONG'S REQUEST FOR PRODUCTION OF DOCUMENTS
I have read the foregoing CROSS-DEFENDANT CHURCH OF SCIENTOLOGY OF CALIFORNIA'S RESPONSE TO CROSS-COMPLAINANT GERALD ARMSTRONG'S REQUEST FOR PRODUCTION OF DOCUMENTS and know its contents.

- I am a party to this action. The matters stated in the foregoing document are true of my own knowledge except as to those matters which are stated on information and belief, and as to those matters I believe them to be true.
- I am an Officer a partner a DIRECTOR of DEPENDANT CHURCH OF SCIENTOLOGY OF CALIFORNIA a party to this action, and am authorized to make this verification for and on its behalf, and I make this verification for that reason. I am informed and believe and on that ground allege that the matters stated in the foregoing document are true. The matters stated in the foregoing document are true of my own knowledge except as to those matters which are stated on information and belief, and as to those matters I believe them to be true.
- I am one of the attorneys for _____ a party to this action. Such party is absent from the county of aforesaid where such attorneys have their offices, and I make this verification for and on behalf of that party for that reason. I am informed and believe and on that ground allege that the matters stated in the foregoing document are true.

Executed on September 2, 1986, at Los Angeles California.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Lynn Farny
Type or Print Name

[Signature]
Signature

ACKNOWLEDGMENT OF RECEIPT OF DOCUMENT
(other than summons and complaint)

Received copy of document described as _____
on _____ 19____

Type or Print Name

Signature

PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF _____ State of California.

I am employed in the county of Los Angeles _____
I am over the age of 18 and not a party to the within action; my business address is: 8530 Wilshire Blvd. Suite 407, Beverly Hills, California 90211

On September 2, 1986, I served the foregoing document described as CROSS-DEFENDANT CHURCH OF SCIENTOLOGY OF CALIFORNIA'S RESPONSE TO CROSS-COMPLAINANT GERALD ARMSTRONG'S REQUEST FOR PRODUCTION OF DOCUMENTS on ALL PARTIES

in this action by placing a true copy thereof enclosed in a sealed envelope addressed as follows:

Julia Dragojevic
Contos & Bunch
5855 Topanga Canyon Blvd.
Suite 440
Woodland Hills, California 91367

EXHIBIT 18 PAGE 14

- (BY MAIL) I caused such envelope with postage thereon fully prepaid to be placed in the United States mail at Los Angeles, California. Executed on September 2, 1986, at Los Angeles California.
- (BY PERSONAL SERVICE) I caused such envelope to be delivered by hand to the office of the addressee. Executed on _____ 19____ at _____ California.
- (State) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.
- (Federal) I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.

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[Signature]